



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

July 19, 2005

Mr. P. C. Gregory, Manager  
Packaging Engineering  
Washington TRU Solutions, LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

SUBJECT: CERTIFICATES OF COMPLIANCE FOR MODEL NOS. TRUPACT-II AND  
HALFPACT PACKAGES

Dear Mr. Gregory:

As requested by your application dated October 4, 2004, as supplemented March 4 and June 8, 2005, enclosed are Certificate of Compliance No. 9218, Revision No. 18, for the Model No. TRUPACT-II package and Certificate of Compliance No. 9279, Revision No. 3, for the Model No. HalfPACT package. These certificates supersede, in their entirety, Certificate of Compliance No. 9218, Revision No. 17, dated August 23, 2004, and Certificate of Compliance No. 9279, Revision No. 2, dated August 23, 2004. These Certificates of Compliance have been issued to the U.S. Department of Energy (DOE) as requested. Changes made to the enclosed certificates are indicated by vertical lines in the margin. The staff's Safety Evaluation Reports are also enclosed.

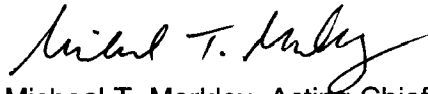
Those on the attached list have been registered as users of the packages under the general license provisions of 10 CFR 71.17 or 49 CFR 173.471 and these conditions. These approvals constitute the authority and conditions to use these packages for shipment of radioactive material and for the packages to be shipped in accordance with the provisions of 49 CFR 173.471. Registered Users may request by letter to remove their names from the Registered Users List.

P. C. Gregory

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If you have any questions regarding these certificates, please contact me or Meraj Rahimi of my staff at (301) 415-8500.

Sincerely,



Michael T. Markley, Acting Chief  
Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Docket Nos. 71-9218 & 71-9279  
TAC Nos. L23774 & L23775

Enclosures: 1. Certificate of Compliance No. 9218, Rev. No. 18  
2. Safety Evaluation Report for TRUPACT-II  
3. Certificate of Compliance No. 9279, Rev. No. 3  
4. Safety Evaluation Report for HalfPACT

cc w/encl: R. Boyle, Department of Transportation  
J. M. Shuler, Department of Energy  
RAMCERTS  
Registered Users

**CERTIFICATE OF COMPLIANCE  
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
|----|-----------------------|--------------------|------------------|----------------------------------|------|-------|
|    | 9218                  | 18                 | 71-9218          | USA/9218/B(U)F-85                | 1    | OF 5  |

**2. PREAMBLE**

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
- b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.

**3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION**

- a. ISSUED TO (*Name and Address*)  
Department of Energy  
Washington, DC 20585
- b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION  
Washington TRU Solutions LLC application dated  
October 4, 2004, as supplemented

**4. CONDITIONS**

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

**5.****(a) Packaging**

- (1) Model No.: TRUPACT-II
- (2) Description

A stainless steel and polyurethane foam insulated shipping container designed to provide double containment for shipment of contact-handled transuranic waste. The packaging consists of an unvented, 1/4-inch thick stainless steel inner containment vessel (ICV), positioned within an outer containment assembly (OCA) consisting of an unvented 1/4-inch thick stainless steel outer containment vessel (OCV), a 10-inch thick layer of polyurethane foam and a 1/4 to 3/8-inch thick outer stainless steel shell. The package is a right circular cylinder with outside dimensions of approximately 94 inches diameter and 122 inches height. The package weighs not more than 19,250 pounds when loaded with the maximum allowable contents of 7,265 pounds.

The OCA has a domed lid which is secured to the OCA body with a locking ring. The OCV containment seal is provided by a butyl rubber O-ring (bore seal). The OCV is equipped with a seal test port and a vent port.

The ICV is a right circular cylinder with domed ends. The outside dimensions of the ICV are approximately 73 inches diameter and 98 inches height. The ICV lid is secured to the ICV body with a locking ring. The ICV containment seal is provided by a butyl rubber O-ring (bore seal). The ICV is equipped with a seal test port and vent port. Aluminum spacers are placed in the top and bottom domed ends of the ICV during shipping. The cavity available for the contents is a cylinder of approximately 73 inches diameter and 75 inches height.

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5.(a)(3) Drawings

The packaging is constructed in accordance with Packaging Technology, Inc., Drawing No. 2077-500 SNP, Sheets 1 through 11, Rev. V. The contents are positioned within the packaging in accordance with the Contact-Handled Transuranic Waste Authorized Methods for Payload Control (CH-TRAMPAC), Rev. 2, Section 2.9, "Payload Container/Assembly Configuration Specifications." The standard pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-001, Rev. 6. The S100 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-002, Rev. 4. The S200 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-003, Rev. 3. The S300 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-004, Sheet 1, Rev. 1. The compacted puck drum spacers needed for the purpose of maintaining subcriticality in 55-, 85-, and 100-gallon drums are constructed and assembled in accordance with Drawing No. 163-006, Rev. 0.

(b) Contents

(1) Type and form of material

Dewatered, solid or solidified transuranic and tritium-contaminated materials and wastes. Materials must be packaged in one of the following payload containers: a 55-gallon drum, an 85-gallon drum, a 100-gallon drum, a standard waste box (SWB), a standard pipe overpack, an S100 pipe overpack, an S200 pipe overpack, an S300 pipe overpack, or ten-drum overpack (TDOP). The payload containers are described in CH-TRAMPAC, Rev. 2, Section 2.9, "Payload Container/Assembly Configuration Specifications." Materials must be restricted to prohibit explosives, corrosives, nonradioactive pyrophorics and pressurized containers. Within a payload container, radioactive pyrophorics must not exceed 1 percent by weight, and free liquids must not exceed 1 percent by volume. Flammable organics and methane are limited along with hydrogen to ensure the absence of flammable gas mixtures in TRU waste payloads as described in Chapter 5.0 of CH-TRAMPAC, Rev. 2. For payloads of content code LA 154 and SQ 154, the absence of flammable gas mixtures is ensured as described in Appendix 6.12 of the CH-TRU Payload Appendices, Rev. 1. For payload configurations with an unvented heat-sealed bag layer, the absence of flammable gas mixtures is ensured as described in Appendix 6.13 of the CH-TRU Payload Appendices, Rev. 1.

(2) Maximum quantity of material per package

Contents not to exceed 7,265 pounds including shoring and secondary containers. The maximum gross weight for a payload container not to exceed the following:

- (i) 1,000 pounds per 55-gallon drum,
- (ii) 328 pounds per 6-inch standard pipe overpack,
- (iii) 547 pounds per 12-inch standard pipe overpack,
- (iv) 550 pounds per S100 pipe overpack,
- (v) 547 pounds per S200 pipe overpack,
- (vi) 547 pounds per S300 pipe overpack,
- (vii) 1,000 pounds per 85-gallon drum,

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- (viii) 1,000 pounds per 100-gallon drum,
- (ix) 4,000 pounds per SWB, or
- (x) 6,700 pounds per TDOP.

## 5.(b)(2) Maximum quantity of material per package (continued)

Maximum number of payload containers per package and authorized packaging configurations are as follows:

- (i) 14 55-gallon drums,
- (ii) 14 standard pipe overpacks,
- (iii) 14 S100 pipe overpacks,
- (iv) 14 S200 pipe overpacks,
- (v) 14 S300 pipe overpacks,
- (vi) 8 85-gallon drums,
- (vii) 6 100-gallon drums,
- (viii) 2 SWBs, or
- (ix) 1 TDOP.

Fissile material not to exceed the limits specified in CH-TRAMPAC, Rev. 2, Section 3.1, "Nuclear Criticality."

The S100, S200, and S300 pipe overpack payloads shall meet the curie limits specified in CH-TRAMPAC, Rev. 2, Section 3.3, "Activity Limits."

Maximum decay heat per package not to exceed 40 watts. Decay heat per payload container not to exceed the values given in CH-TRAMPAC, Rev. 2, Table 5.2-1, "List of Approved Alpha-numeric Shipping Categories, Maximum Allowable Hydrogen Gas Generation Rates, and Maximum Allowable Wattages," or calculated for approved shipping categories in accordance with the methodology specified in Section 5.2.3 of CH-TRAMPAC, Rev. 2. For content code LA 154 and SQ 154 payloads, decay heat per payload container not to exceed the values specified in Appendix 6.12 of CH-TRU Payload Appendices.

5. (c) Criticality Safety Index: 0.0
6. Physical form, chemical properties, chemical compatibility, configuration of waste containers and contents, isotopic inventory, fissile content, decay heat, weight, center of gravity, and radiation dose rate must be determined and limited in accordance with CH-TRAMPAC, Rev. 2.
7. Each payload container must be assigned to a shipping category in accordance with CH-TRAMPAC, Rev. 2, Section 5.1, "Payload Shipping Category." For a payload assembly made up of payload containers with the same shipping categories, each payload container and payload assembly must not exceed the allowable wattage in accordance with CH-TRAMPAC, Rev. 2, Section 5.2.3, "Hydrogen Gas Generation Rate and Decay Heat Limits for analytical category" or must be tested for gas generation in accordance with CH-TRAMPAC, Rev. 2, Section 5.2.5, "Unified Flammable Gas Test Procedure." For a payload made up of payload containers with different (nonequivalent) shipping categories, the flammability index of each payload container must not exceed 50,000 in accordance with CH-TRAMPAC, Rev. 2, Section 6.2.4, "Mixing of Shipping Categories," and Appendix 2.4 of the CH-TRU Payload Appendices, "Mixing of Shipping Categories"

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and Determination of the Flammability Index." Each content code LA 154 and SQ 154 payload container must be assigned to a shipping category in accordance with Appendix 6.12 of CH-TRU Payload Appendices. Content code LA 154 payload containers may only be assembled with other payload containers belonging to content code LA 154 or dunnage in accordance with Appendix 6.12 of CH-TRU Payload Appendices. For a payload of content code LA 154 or SQ 154 containers with different shipping categories, the flammability index of each payload container must not exceed 50,000 in accordance with Appendix 6.12 of CH-TRU Payload Appendices.

8. Payload containers within a package shall be selected in accordance with CH-TRAMPAC, Rev. 2, Section 6.0, "Payload Assembly Requirements." Payload containers of content code LA 154 shall be assembled in accordance with Appendix 6.12 of CH-TRAMPAC, Rev. 2.
9. Each payload container must be vented in accordance with Section 2.5, "Filter Vents," of the CH-TRAMPAC, Rev. 2. Drums which were not equipped with filtered vents during storage must be aspirated in accordance with CH-TRAMPAC, Rev. 2, Section 5.3, "Venting and Aspiration."
10. For close-proximity and controlled shipments meeting the conditions specified in Appendices 3.5 and 3.6, respectively, of CH-TRU Payload Appendices, shipping periods of 20 days and 10 days may be applicable. The shipping period for any mode of transport is not to exceed 60 days. For content code LA 154 and SQ 154 shipments, the shipping period as defined in Appendix 6.12 of the CH-TRU Payload Appendices is not to exceed 5 and 10 days, respectively.
11. In addition to the requirements of Subpart G of 10 CFR Part 71:
  - (a) Each package must be prepared for shipment and operated in accordance with the procedures described in Chapter 7.0, "Operating Procedures," of the application, as supplemented. For content code LA 154 payloads, each package must be prepared for shipment and operated in accordance with the procedures described in Chapter 7.0 of the application, as modified by Appendix 6.12 of CH-TRU Payload Appendices.
  - (b) Each package must be tested and maintained in accordance with the procedures described in Chapter 8.0, "Acceptance Tests and Maintenance Program," of the application, as supplemented.
  - (c) Prior to each shipment, the lid and vent port seals on the inner and outer containment vessels must be leak tested in accordance with Sections 7.1.5 and 7.1.6 of the Safety Analysis Report.
  - (d) All free standing water must be removed from the inner containment vessel cavity and the outer containment vessel cavity before shipment.
12. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
13. Expiration date: August 31, 2009.

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REFERENCES

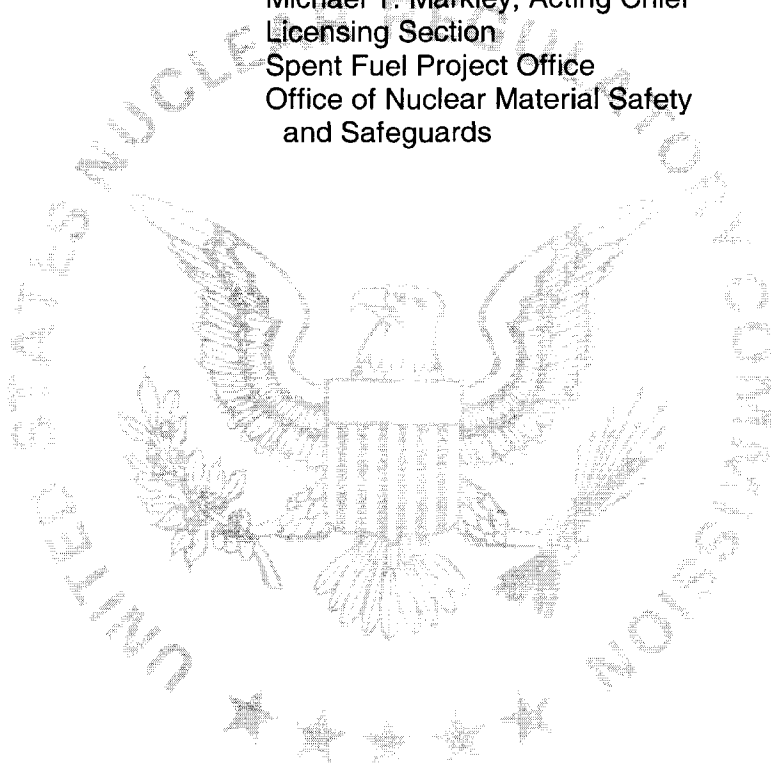
Washington TRU Solutions, LLC, October 4, 2004 and March 4 and June 8, 2005.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



Michael T. Markley, Acting Chief  
Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Date: 07/19/2005





UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION REPORT  
Docket No. 71-9218  
Model No. TRUPACT-II Package  
Certificate of Compliance No. 9218  
Revision No. 18

**SUMMARY**

By application dated October 4, 2004, as supplemented March 4 and June 8, 2005, Washington TRU Solutions, LLC, on behalf of the Department of Energy, requested an amendment to Certificate of Compliance No. 9218, Revision No. 17, for the Model No. TRUPACT-II package. The amendment request included the following changes:

**SAFETY ANALYSIS REPORT:**

- Changing the revision number from Revision 20 to Revision 21, and the date.

**CH-TRAMPAC:**

- Changing the revision number from Revision 1 to Revision 2, and the date.
- Revising Page xiv to update the title of Appendix 6.12.
- Revising Section 1.1, Page 1-1 to reflect the revised scope of Appendix 6.12.
- Revising Section 2.2.1, Page 2.2-1 to clarify that empty 55-gallon drums(s) can be used as dunnage container(s) to complete a payload of pipe overpacks.
- Revising Table 3.1-1, Page 3.1-4 to remove Ten-Drum Overpack (TDOP) as authorized payload container for HalfPACT.
- Revising Section 5.0, Page 5.1-1 for referencing Appendix 6.12 of CH-TRU Payload Appendices to which Content Code SQ 154 has been added.
- Revising Section 6.0, Page 6.1-1 for referencing Appendix 6.12 of CH-TRU Payload Appendices to which Content Code SQ 154 has been added.

**CH-TRU PAYLOAD APPENDICES:**

- Changing the Revision number from Revision 0 to Revision 1 and the date.
- Revising Page ii to update the title of Appendix 6.12.
- Correcting a typographical error in Page 2.2-9 for the resistance factor for the SWB overpack with a filter type of  $7.4 \times 10^{-6}$  moles/second/mole fraction.
- Correcting a typographical error in the equation for  $Y_{ICL}$  on Page 3.9-18.
- Correcting typographical errors in Equations (5) and (6) on Page 3.10-3 and Equation (20) on Page 3.10-6.
- Revising Appendix 6.12 to extend the methodology previously approved for CH-TRU waste from Technical Area 54 at Los Alamos National Laboratory (LANL) to the shipment of high-wattage CH-TRU waste from any DOE site.

Based on the statements and representations in the application, the staff agrees that the changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.



## **1. GENERAL INFORMATION**

The changes applicable to this section are related only to the contents and drawings.

### **1.1 Contents**

The following paragraphs describe the major changes with respect to the contents of the TRUPACT-II packaging and the staff evaluation of these changes. The editorial and correctional changes made to the Safety Analysis Report (SAR), CH-TRAMPAC, and CH-TRU Payload Appendices by the applicant are not discussed.

#### **CH-TRAMPAC**

Most of the changes made to CH-TRAMPAC have been editorial, correctional, and for clarification purposes. The remaining changes were due to adding the reference to CH-TRU Payload Appendix 6.12 for content codes SQ 154 in specifying the compliance with the gas generation requirements.

The staff agrees with the editorial, correctional, and clarifying changes made to CH-TRAMPAC. Furthermore, the staff agrees with changes made to CH-TRAMPAC in order to reference CH-TRU Payload Appendix 6.12 for content codes SQ 154 compliance with the gas generation requirements.

#### **CH-TRU Payload Appendices, Revision No. 1, Appendix 6.12**

The proposed amendment extends the use of the methodology described in CH-TRU Payload Appendix 6.12 for the shipment of high-wattage CH-TRU waste to other DOE sites whose waste can be classified under Content Code SQ 154. Previously, only waste generated at the Los Alamos National Laboratory and classified as Content Code LA 154 could be shipped under these specific conditions and controls. The payload containers and packaging configurations for Content Codes LA 154 and SQ 154 are provided in Section 6.12.10 of the CH-TRU Payload Appendices, Appendix 6.12.

Based on operational experience at LANL with the evacuation process, the limits for content code LA 154 have been reevaluated, assuming a final evacuation pressure of 2 torr. Previously, a final pressure of 50 mtorr was considered. As a consequence, the flammable gas generation rate and decay heat limits for content code LA 154 have been reduced. Due to the geographical proximity between LANL and the WIPP site, a 5-days shipping time is still assumed. The new values are shown in the following table:

Content Code LA 154 Flammable Gas Generation Rate and Decay Heat Limits

| <b>Content Code</b> | <b>Flammable Gas<br/>Generation Rate Limit<br/>per Drum<br/>(moles/second)</b> | <b>Decay Heat Limit<br/>per Drum<br/>(watts)</b> |
|---------------------|--|--|
| LA 154A             | 2.0581E-7  | 1.8219   |
| LA 154B             | 2.7172E-7  | 2.4053   |
| LA 154C             | 1.8936E-7  | 1.6762   |
| LA 154D             | 2.3173E-7  | 2.0513   |

For Content Code SQ 154, a shipping time of 10 days is assumed, based on a previously approved study of controlled shipments from different DOE labs to the WIPP site, as outlined in Appendix 3.6 of the CH-TRU Payload Appendices. Considering the 12-hour minimum evacuation process in order to bring the ICV vacuum pressure down to less than or equal to 2 torr, the following limits are then derived:

Content Code SQ 154 flammable Gas Generation Rate and Decay Heat Limits

| <b>Content Code</b> | <b>Flammable Gas<br/>Generation Rate Limit<br/>per Drum<br/>(moles/second)</b> | <b>Decay Heat Limit<br/>per Drum<br/>(watts)</b> |
|---------------------|--|--|
| SQ 154A             | 1.0924E-7  | 0.9670   |
| SQ 154B             | 1.6075E-7  | 1.4230   |
| SQ 154C             | 1.2298E-7  | 1.0886   |
| SQ 154D             | 1.4949E-7  | 1.3233   |
| SQ 154E             | 9.8873E-8  | 0.8752   |
| SQ 154F             | 2.6261E-7  | 2.3247   |
| SQ 154G             | 1.0633E-7  | 0.9412   |

In addition, all payloads comprised of containers belonging to Content Codes LA 154 and SQ 154 still must meet the design limit of 40 watts per TRUPACT-II.

Mixing of shipping categories is allowed only within containers of a single content code (e.g., all containers within a payload must belong to Content Code LA 154). Limits applicable under

of shipping categories are addressed in Section 6.12.9 of the CH-TRU Payload Appendices, Appendix 6.12, where flammability indexes (FI) are defined. A payload is qualified for shipment only if the FI of each payload container is a non-negative number less than or equal to 50,000.

Section 5.0 of the CH-TRAMPAC was revised to indicate that compliance with the gas generation requirements for Content Code SQ 154, in addition to Content Code LA 154, is described in Appendix 6.12 of CH-TRU Payload Appendices.

Section 6.0 of the CH-TRAMPAC was revised to indicate that compliance with the payload certification requirements for Content Codes SQ 154, in addition to Content Code LA 154, is described in Appendix 6.12 of CH-TRU Payload Appendices.

The staff agrees with the applicant's conclusion that the package meets the requirements of 10 CFR Part 71 when the allowable contents are limited as described in the CH-TRAMPAC document and related Sections of the CH-TRU Payload Appendices document.

No other changes were made to the SAR, the TRAMPAC, or the Payload Appendices.

## **Conclusion**

The applicant adequately described the amended contents of the Model No. TRUPACT-II package as required by 10 CFR 71.33(b). In addition, the applicant evaluated the amended contents with respect to potential for flammable gas generation, and the potential presence of flammable VOCs. The staff agrees with the applicant's conclusion that the package meets the requirements of 10 CFR Part 71 when the contents are limited as described in the CH-TRAMPAC document and related sections of the CH-TRU Payload Appendices document.

## **CONDITIONS**

Condition No. 5(c) of the certificate was revised to delete the wording "Minimum transport index to be shown on label for nuclear criticality control" and leave the wording "Criticality Safety Index" as defined in 10 CFR 71.4 that became effective October 1, 2004 (69 FR 3698).

Condition No. 12 of the certificate was revised to clarify that the package is approved for use under the general license provisions of 10 CFR 71.17. This change is due to a revision in the numbering of the sections in 10 CFR Part 71 that became effective on October 1, 2004 (69 FR 3698).

## **CONCLUSION**

The Certificate of Compliance has been revised to reference Revision No. 21 of the SAR with associated changes. The changes do not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9218, Revision No. 18, on July 19, 2005.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 19, 2005

Mr. P. C. Gregory, Manager  
Washington TRU Solutions, LLC  
P.O. Box 2078  
Carlsbad, NM 88221-2078

SUBJECT: CERTIFICATE OF COMPLIANCE NO. 9279 FOR MODEL NO. HalfPACT  
PACKAGE

Dear Mr. Gregory:

As requested by your application dated August 19, 2005, enclosed is Certificate of Compliance No. 9279, Revision No. 4, for Model No. HalfPACT package. The staff's Safety Evaluation Report is also enclosed. Changes made to the enclosed Certificate of Compliance are indicated by vertical lines in the right margin.

The Department of Energy has been registered as the user of the package under the general license provision of 10 CFR §71.17 or 49 CFR §173.471. The approval constitutes authority to use the packages for shipment of radioactive material and for the packages to be shipped in accordance with the provisions of 49 CFR §173.471.

If you have any questions regarding this certificate, please contact me or Meraj Rahimi of my staff at (301) 415-8500.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Nelson", is written over a horizontal line.

Robert A. Nelson, Section Chief  
Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Docket No: 71-9279  
TAC No: L23889

Enclosures: 1. Certificate of Compliance  
No. 9279, Rev. No. 4  
2. Safety Evaluation Report

cc w/encls: R. Boyle, Department of Transportation  
J. M. Shuler, Department of Energy  
RAMCERTS

**CERTIFICATE OF COMPLIANCE  
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
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|    | 9279                  | 4                  | 71-9279          | USA/9279/B(U)F-85                | 1 OF | 4     |

## 2. PREAMBLE

- a. This certificate is issued to certify that the package (packaging and contents) described in Item 5 below meets the applicable safety standards set forth in Title 10, Code of Federal Regulations, Part 71, "Packaging and Transportation of Radioactive Material."
- b. This certificate does not relieve the consignor from compliance with any requirement of the regulations of the U.S. Department of Transportation or other applicable regulatory agencies, including the government of any country through or into which the package will be transported.

## 3. THIS CERTIFICATE IS ISSUED ON THE BASIS OF A SAFETY ANALYSIS REPORT OF THE PACKAGE DESIGN OR APPLICATION

- a. ISSUED TO (*Name and Address*)  
Department of Energy  
Washington, DC 20586
- b. TITLE AND IDENTIFICATION OF REPORT OR APPLICATION  
Washington TRU Solutions LLC application dated  
October 4, 2004, as supplemented.

## 4. CONDITIONS

This certificate is conditional upon fulfilling the requirements of 10 CFR Part 71, as applicable, and the conditions specified below.

## 5.

## (a) Packaging

- (1) Model No.: HalfPACT Waste Shipping Container
- (2) Description

A stainless steel and polyurethane foam insulated shipping container designed to provide double containment for shipment of contact-handled transuranic waste. The packaging consists of an unvented, 1/4-inch thick stainless steel inner containment vessel (ICV), positioned within an outer containment assembly (OCA) consisting of an unvented 1/4-inch thick stainless steel outer containment vessel (OCV), an approximate 8-inch thick layer of polyurethane foam, a 1/4-inch thick layer of ceramic fiber paper and a 1/4 to 3/8-inch thick outer stainless steel shell. The package is a right circular cylinder with outside dimensions of approximately 94 inches diameter and 92 inches height. The package weighs not more than 18,100 pounds when loaded with the maximum allowable contents of 7,600 pounds.

The OCA has a domed lid which is secured to the OCA body with a locking ring. The OCV containment seal is provided by a butyl rubber O-ring. The OCV is equipped with a seal test port and a vent port.

The ICV is a right circular cylinder with domed ends. The outside dimensions of the ICV are approximately 74 inches diameter and 69 inches height. The ICV lid is secured to the ICV body with a locking ring. The ICV containment seal is provided by a butyl rubber O-ring. The ICV is equipped with a seal test port and vent port. Aluminum spacers are placed in the top and bottom domed ends of the ICV during shipping. The cavity available for the contents is a cylinder of approximately 73 inches diameter and 45 inches height.

**CERTIFICATE OF COMPLIANCE  
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5.(a)(3) Drawings

The package is constructed and assembled in accordance with Packaging Technology, Inc., Drawing 707-SAR Sheets 1-12, Rev. 6. The standard pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc. Drawing No. 163-001, Sheets 1-3, Rev. 6. The S100 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-002, Sheets 1 and 2, Rev. 4. The S200 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-003, Sheets 1 and 2, Rev. 3. The S300 pipe overpack is constructed and assembled in accordance with Packaging Technology, Inc., Drawing No. 163-004, Sheet 1, Rev. 1. The compacted puck drum spacers needed for the purpose of maintaining subcriticality in 55-, 85-, and 100-gallon drums are constructed and assembled in accordance with Drawing No. 163-006, Rev. 0.

(b) Contents

(1) Type and form of material

Byproduct, source, and special nuclear material in the form of dewatered, solid or solidified materials and wastes. Materials must be packaged in one of the following payload containers: a 55-gallon drum, standard waste box (SWB), 85-gallon drum, standard pipe overpack, S100 pipe overpack, S200 pipe overpack, S300 pipe overpack, or 100-gallon drum. The payload containers are described in Section 2.9, "Payload Container/Assembly Configuration Specifications," of the CH-TRAMPAC, Rev. 2. Explosives, corrosives (pH less than 2 or greater than 12.5), nonradioactive pyrophorics, and compressed gases are prohibited. Within a payload container radioactive pyrophorics must not exceed 1 weight percent by weight and free liquids must not exceed 1 percent by volume. Flammable organics and methane are limited along with hydrogen to ensure the absence of flammable gas mixtures in TRU waste payloads as described in Chapter 5.0 of the CH-TRAMPAC, Rev. 2. For payload configurations with an unvented heat-sealed bag layer, the absence of flammable gas mixtures is ensured as described in Appendix 6.13 of the CH-TRU Payload Appendices, Rev. 1.

(2) Maximum quantity of material per package

The package contents are limited to 7,600 pounds, including the weight of the payload containers and any other components of the payload assembly. The maximum gross weight for a payload container not to exceed the following:

- (i) 328 pounds per 6-inch standard pipe overpack,
- (ii) 547 pounds per 12-inch standard pipe overpack,
- (iii) 550 pounds per S100 pipe overpack,
- (iv) 547 pounds per S200 pipe overpack,
- (v) 547 pounds per S300 pipe overpack,
- (vi) 1,000 pounds per 100-gallon drum,
- (vii) 1,000 pounds per 55-gallon drum,
- (viii) 1,000 pounds per 85-gallon drum, or
- (ix) 4,000 pounds per SWB.

**CERTIFICATE OF COMPLIANCE  
FOR RADIOACTIVE MATERIAL PACKAGES**

| 1. | a. CERTIFICATE NUMBER | b. REVISION NUMBER | c. DOCKET NUMBER | d. PACKAGE IDENTIFICATION NUMBER | PAGE | PAGES |
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5.(b)(2) Maximum number of payload containers per package and authorized packaging configurations as follows:

- (i) 7 55-gallon drums,
- (ii) 7 standard pipe overpacks,
- (iii) 7 S100 pipe overpacks,
- (iv) 7 S200 pipe overpacks,
- (v) 7 S300 pipe overpacks,
- (vi) 4 85-gallon drums,
- (vii) 3 100-gallon drums, or
- (viii) 1 SWB.

Fissile material not to exceed the limits specified in CH-TRAMPAC, Rev. 2, Section 3.1, "Nuclear Criticality."

The S100, S200, and S300 pipe overpack payloads shall meet the curie limits specified in CH-TRAMPAC, Rev. 2, Section 3.3, "Activity Limits."

Maximum decay heat per package not to exceed 30 watts. Decay heat per payload container not to exceed the values in Table 5.2-1 of the CH-TRAMPAC, Rev. 2, "List of Approved Alphanumeric Shipping Categories, Maximum Allowable Hydrogen Gas Generation Rates, and Maximum Allowable Wattages," or calculated for approved shipping categories in accordance with the methodology specified in Section 5.2.3 of the CH-TRAMPAC, Rev. 2."

5. (c) Criticality Safety Index: 0.0
6. Physical form, chemical properties, chemical compatibility, configuration of waste containers and contents, isotopic inventory, fissile content, decay heat, weight and center of gravity; and radiation dose rate must be determined and limited in accordance with CH-TRAMPAC, Rev. 2.
7. Each payload container must be assigned to a shipping category in accordance with Section 5.1, "Payload Shipping Category" of CH-TRAMPAC, Rev. 2. Each payload container and payload assembly must not exceed the allowable wattage in accordance with Section 5.2.3, "Hydrogen Gas Generation Rate and Decay Heat Limits for Analytical Category," or must be tested for gas generation in accordance with Section 5.2.5, "Unified Flammable Gas Test Procedure," of CH-TRAMPAC, Rev. 2. For a payload made up of payload containers with different (nonequivalent) shipping categories, the flammability index of each payload container must not exceed 50,000 in accordance with CH-TRAMPAC, Rev. 2, Section 6.2.4, "Mixing of Shipping Categories," and Appendix 2.4 of the CH-TRU Payload Appendices, "Mixing of Shipping Categories and Determination of the Flammability Index."
8. Payload containers within a package shall be selected in accordance with Section 6.0, "Payload Assembly Requirements" of CH-TRAMPAC, Rev. 2.
9. Each payload container must be vented in accordance with Section 2.5, "Filter Vents" of CH-TRAMPAC, Rev. 2. Drums which were not equipped with filtered vents during storage must be aspirated in accordance with Section 5.3, "Venting and Aspiration" of CH-TRAMPAC, Rev. 2.

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10. For close-proximity and controlled shipments meeting the conditions specified in Appendices 3.5 and 3.6, respectively, of CH-TRU Payload Appendices, shipping periods of 20 days and 10 days may be applicable. The shipping period for any mode of transport is not to exceed 60 days. The content code LA 154 and SQ 154 are not authorized for loading and shipment in the HalfPACT packagings.
11. In addition to the requirements of Subpart G of 10 CFR Part 71:
- (a) Each package must be prepared for shipment and operated in accordance with the procedures described in Chapter 7.0, "Operating Procedures," of the application, as supplemented.
  - (b) Each package must be tested and maintained in accordance with the procedures described in Chapter 8.0, "Acceptance Tests and Maintenance Program," of the application, as supplemented.
  - (c) All free standing water must be removed from the inner containment vessel cavity and the outer containment vessel cavity before shipment.
12. The package authorized by this certificate is hereby approved for use under the general license provisions of 10 CFR 71.17.
13. Expiration date: October 31, 2010.
14. Revision No. 3 of this certificate may be used until October 31, 2006.

REFERENCES

Washington TRU Solutions, LLC, October 4, 2004 and March 4, June 8, and August 19, 2005.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION



Robert A. Nelson, Chief  
Licensing Section  
Spent Fuel Project Office  
Office of Nuclear Material Safety  
and Safeguards

Date: 10/19/05



## **SAFETY EVALUATION REPORT**

**Docket No. 71-9279**  
**Model No. HalfPACT**  
**Certificate of Compliance No. 9279**  
**Revision 4**

### **SUMMARY**

By application dated August 19, 2005, Washington TRU Solutions LLC, on behalf of the U.S. Department of Energy (DOE), requested renewal of Certificate of Compliance No. 9279, for the Model No. HalfPACT package. Washington TRU Solutions did not request any changes to the package design or authorized contents. The certificate has been renewed for a five year term.

### **EVALUATION**

By application dated August 19, 2005, Washington TRU Solutions, on behalf of the DOE, requested renewal of Certificate of Compliance No. 9279, for the Model No. HalfPACT package. Washington TRU Solutions did not request any changes to the package design or authorized contents. The staff reviewed the documents referenced in the certificate and determined that the documentation was available and complete. The staff also reviewed the operating and maintenance procedures for the package and found them to be complete and adequate.

The certificate was revised to include Condition No. 14 which authorizes use of the previous revision of the certificate for a period of approximately one year.

### **CONCLUSION**

The Certificate of Compliance has been renewed for a five year term that expires on October 31, 2010. This change does not affect the ability of the package to meet the requirements of 10 CFR Part 71.

Issued with Certificate of Compliance No. 9279, Revision No. 4,  
on October 19, 2005